



STATE OF NEW YORK
OFFICE OF THE ATTORNEY GENERAL

LETITIA JAMES
ATTORNEY GENERAL

DIVISION OF SOCIAL JUSTICE
CIVIL RIGHTS BUREAU

March 1, 2021

VIA ECF

The Honorable Gabriel W. Gorenstein
United States District Court
Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl Street
New York, New York 10007

Re: New York City Policing During Summer 2020 Demonstrations
[*Payne, et al. v. Mayor Bill de Blasio, et al.*, 20 Civ. 8924 (CM)
Sierra, et al. v. City of New York, et al., 20 Civ. 10291 (CM)
Wood v. City of New York, et al., 20 Civ. 10541 (CM)
People of the State of New York v. City of New York, et al., 21 Civ. 322 (CM)
Sow, et al. v. City of New York, et al., 21 Civ. 533 (CM)]

Dear Judge Gorenstein:

We represent the plaintiff in *People v. City of New York, et al.*, 21 Civ. 322. Pursuant to Chief Judge McMahon's order at the February 22, 2021 initial conference, we submit this letter on behalf of the parties in the above-referenced consolidated actions to propose interim discovery deadlines.

The parties have conferred regarding discovery. In addition to agreeing to serve discovery requests electronically and to confer later this week regarding e-discovery, we propose the below interim deadlines; the Court-ordered discovery deadlines are included in bold for reference.

March 18, 2021:	Initial Disclosures Due
March 25, 2021:	First Request for Documents and First Set of Interrogatories Due
April 8, 2021:	Defendants to provide proposed date for completion of document production
April 26, 2021:	Objections and Responses due; Rolling production begins
July 1, 2021:	Deadline to depose class plaintiffs

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September 1, 2021: Expert reports must be exchanged

September 10, 2021: Class Certification Motions Due

December 31, 2021: Deadline for all fact and expert discovery

The only matter upon which the parties could not agree was whether a deadline should be imposed for depositions. Plaintiffs maintain that a November 30 deadline to conclude depositions will aid the parties in resolving any disputes and completing discovery on time. Defendants believe that depositions should be allowed up until the end of discovery on December 31.

Counsel welcome a conference with Your Honor to discuss this proposal and we thank the Court for its consideration of this matter.

Respectfully submitted,

/s/ Lillian Marquez

Jessica Clarke, *Civil Rights Bureau Chief*

Lillian Marquez, *Assistant Attorney General*

Morenike Fajana, *Special Counsel*

Travis England, *Assistant Attorney General*

Gregory Morril, *Assistant Attorney General*

Office of the New York State Attorney General

28 Liberty Street, 20th Floor

New York, NY 10005

Tel.: (212) 416-8250

cc: All Counsel of Record (by ECF)